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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF STACY CAMPOS IN
SUPPORT OF REORGANIZED DEBTORS'
ONE HUNDRED EIGHTEENTH OMNIBUS
OBJECTION TO CLAIMS (CHARMBURY
CLAIMS)**

Response Deadline:
November 16, 2022, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: November 30, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Stacy Campos, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as a Managing Counsel, Employment, Labor and Workers'
5 Compensation, in the Law Department of Pacific Gas and Electric Company (the "**Utility**"), a wholly-
6 owned subsidiary of PG&E Corporation ("**PG&E Corp.**") and together with Utility, the "Reorganized
7 Debtors" in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**"). In my current role, I am
8 responsible for supervising three employment and labor attorneys, and advising leaders on human
9 resource and labor issues. I submit this Declaration in support of the *Reorganized Debtors' One Hundred*
10 *Eighteenth Omnibus Objection to Claims (Charmbury Claims)* (the "**Omnibus Objection**"),¹ filed
11 contemporaneously herewith.

12 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
13 my personal knowledge, the knowledge of other personnel of the Reorganized Debtors working under
14 and alongside me on this matter, my discussions with PG&E's professionals and various other advisors
15 and counsel, and my review and my colleagues' review of relevant documents and information. If called
16 upon to testify, I would testify competently to the facts set forth in this Declaration. I am authorized to
17 submit this declaration on behalf of the Reorganized Debtors.

18 3. In relevant part, the Omnibus Objection is directed at the Proofs of Claim specifically
19 identified in **Exhibit 1** to the Omnibus Objection. The Charmbury Claims that are the subject of this
20 Declaration is identified in the column headed "Claims to Be Disallowed and Expunged" therein.

21 4. **Exhibit 1** was prepared by the AlixPartners, LLP ("**AlixPartners**") team charged with
22 the Bankruptcy Case Management component of AlixPartners' assignment to assist the Reorganized
23 Debtors, based on information provided by me, and I have reviewed it to confirm its accuracy. I am
24 familiar with it, its contents, and the process under which it was prepared. To the best of my knowledge,
25 information and belief, **Exhibit 1** accurately identifies the Charmbury Claims.

26 5. Contrary to the allegations in the Charmbury Claims, for safety reasons, two weeks prior

27 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
28 the Omnibus Objection.

1 to her scheduled leave of absence to deliver her baby, Ms. Charmbury's substation construction
2 supervisor assigned her to work at a location closer to her home, and indoors, so that she would not have
3 to work in projected 104-degree heat and over 30 miles from the closest medical facility in the event of
4 an emergency. Her duties at the new location were the same as those typically performed by persons
5 with her job classification. And when she objected to this reassignment through PG&E's Compliance
6 and Ethics Hotline, within less than 48 hours she was returned to her original assignment.

7 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
8 correct to the best of my knowledge, information, and belief. Executed this 24th day of October, 2022.

9 /s/ Stacy Campos
10 Stacy Campos
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